

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

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U.S. DISTRICT COURT-WVND  
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

v.

BOBBY JOE COBB,

Defendant.

Criminal No. 2:23-CR-24

Violations: 18 U.S.C. § 875(c)  
18 U.S.C. § 922(g)(9)  
18 U.S.C. § 924(a)(8)

**INDICTMENT**

The Grand Jury charges that:

**COUNT ONE**

(Interstate Communications with a Threat to Kidnap or Injure)

On or about March 7, 2023, in Upshur County, in the Northern District of West Virginia, the defendant, **BOBBY COBB**, did knowingly transmit in interstate commerce an email communication over the Internet containing a threat to injure the person of another. Specifically, COBB, intending to communicate a threat of personal injury to Jane Doe and her friend, sent emails to Jane Doe stating:

- “And when I see the two you must slam your damn heads together Tell him I said that”
- “I wish your boyfriend would meet me somewhere so I can get some this fucking anger out on me by kicking the fucking guts out of him”
- “but I’m sure he’s not that fucking stupid cause I will fucking hurt him”

in violation of Title 18, United States Code, Section 875(c).

**COUNT TWO**

(Interstate Communications with a Threat to Kidnap or Injure)

On or about March 11, 2023, in Upshur County, in the Northern District of West Virginia, the defendant, **BOBBY COBB**, did knowingly transmit in interstate commerce text message communication via telecommunication services containing a threat to injure the person of another. Specifically, COBB, intending to communicate a threat of personal injury to Jane Doe and her children, sent text messages to Jane Doe stating:

- “Today at 1333 hours – Move back in with me neither one of your kids will die. You don’t want them will die and you better be here at 3 o’clock today”
- “Today at 1618 hours – you will be going to one of your kids funerals real soon”

in violation of Title 18, United States Code, Section 875(c).

**COUNT THREE**

(Interstate Communications with a Threat to Kidnap or Injure)

On or about March 13 and 14, 2023, in Upshur County, in the Northern District of West Virginia, the defendant, **BOBBY COBB**, did knowingly transmit in interstate commerce text message communication via telecommunication services containing a threat to injure the person of another. Specifically, COBB, intending to communicate a threat of personal injury to Jane Doe and her children, mother, and friend, sent text messages to Jane Doe stating:

- “You were going to fucking die by my hands in a cruel fucking way and I hope your whore friend is with you so I can get her to”
- “Why don’t you just commit suicide”
- “I swear on my mother’s grave, I am waiting slave you are a dead motherfucker”
- “And I can’t find you, I’ll kill one of your fucking kids”
- “I can’t wait to look in your eyes you take your last breath”
- “Them I’m going to fuck your corpse”
- “You’re the most unsafe mother fucker as ever lived you better never go to sleep”
- “Cannot fucking wait to torture and kill you motherfucker”
- “If you want your kids to survival to come and talk to me because if you don’t, I’ll kill him first”
- “Try me go to the cops. I’ll kill yout mother”
- “Come Malone come and see me at 3 o’clock. I mean it.”
- “If you don’t show up, I hope you like them the love ones funerals”Yep Brandon, how do I kill him on going to fuck jenna”

in violation of Title 18, United States Code, Section 875(c).

**COUNT FOUR**

(Interstate Communications with a Threat to Kidnap or Injure)

On or about March, 2023, in Upshur County, in the Northern District of West Virginia, the defendant, **BOBBY COBB**, did knowingly transmit in interstate commerce text message communication via telecommunication services containing a threat to injure the person of another. Specifically, COBB, intending to communicate a threat of personal injury to his wife, Jane Doe, and her friend, sent text messages to Jane Doe stating:

- “you tell me who your boyfriend is I will start with him but I’ll kill every motherfucker I fucking see”

in violation of Title 18, United States Code, Section 875(c).

**COUNT FIVE**

(Unlawful Possession of a Firearm)

On or about March 16, 2023, in Upshur County, in the Northern District of West Virginia, defendant **BOBBY COBB**, knowing he had been previously convicted of a misdemeanor crime of domestic violence, that is, Domestic Battery – 2<sup>nd</sup> Offense, W.V. Code 61-2-28(c), Upshur County Magistrate Court, case number 08M-526, July 10, 2008, knowingly possessed a firearm in and affecting interstate commerce, that is, a Rossi, model S41, .410 break barrel shotgun, serial number SSP220668; in violation of Title 18, United States Code, Sections 922(g)(9) and 924(a)(8).

**FORFEITURE ALLEGATION**

*Gun Control Act  
Controlled Substance Act*

- A. Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1), the government will seek the forfeiture of any firearm and any ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922(g), including a Rossi, model S1, .410 break barrel shotgun, serial number SSP220668, and ammunition.
- B. Pursuant to Title 21, United States Code, Sections 841(a) and 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including a Rossi, model S1, .410 break barrel shotgun, serial number SSP220668, and ammunition.

A true bill,

/s/ \_\_\_\_\_  
Foreperson

/s/ \_\_\_\_\_  
WILLIAM IHLENFELD  
United States Attorney

Christie S. Utt  
Morgan McKee  
Assistant United States Attorneys